

EXHIBIT B

From: Andrew Brettler abrettler@berkbrettler.com

Subject: Re: Bonnell / Doe

Date: September 22, 2025 at 7:45 AM

To: Carlos Garcia Perez cgarciaperez@smgqlaw.com

Cc: petersjoan petersjoan@bellsouth.net, Gustavo D. Lage GLage@smgqlaw.com, Andrea Garcia agarciaw2@gmail.com, Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino ppatino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Regina Peter rpeter@berkbrettler.com, Maria Favela mfavela@berkbrettler.com

Our client is generally available during the week of Nov. 3. With the exception Nov. 4 (I have a court hearing in another matter), we will endeavor to make Mr. Bonnell available for deposition any day that week. While we are in Miami, let's also set Plaintiff's deposition for the same week. Please let us know what works for you and her. Thank you.

Sincerely,

Andrew B. Brettler | BERK BRETTLER LLP
9119 W. Sunset Blvd. | West Hollywood, CA 90069
O: +1.310.278.2111 | M: +1.917.620.2726

On Sep 19, 2025, at 4:53 AM, Carlos Garcia Perez <cgarciaperez@smgqlaw.com> wrote:

Good morning I hope you are all doing well. Andrew I am following up on the deposition dates for your client as mentioned below. Please let us know and thank you. Carlos

Carlos A. Garcia Perez
Partner

<image001.png>

201 Alhambra Circle | Suite 1205 | Miami, Florida 33134

Office: 305.377.1000 | Fax: 855.327.0391

cgarciaperez@smgqlaw.com | SMGQLAW.com

From: petersjoan <petersjoan@bellsouth.net>

Date: Wednesday, September 17, 2025 at 5:34 PM

To: Andrew Brettler <abrettler@berkbrettler.com>

Cc: Carlos Garcia Perez <cgarciaperez@smgqlaw.com>, Gustavo D. Lage <GLage@smgqlaw.com>, Andrea Garcia <agarciaw2@gmail.com>, Angie Velando <angie@smgqlaw.com>, Robert "Bob" L. Raskopf <rraskopf@bilzin.com>, Patricia M. Patino <ppatino@bilzin.com>, Jake Camara <jcamara@berkbrettler.com>, Joel Sichel <jsichel@berkbrettler.com>, Regina Peter <rpeter@berkbrettler.com>, Maria Favela <mfavela@berkbrettler.com>

Subject: Re: Bonnell / Doe

SECURITY NOTE: *This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links *

Counsel:

The discovery cut-off date as per the Court's Scheduling Order is December 16th. With that in mind, we would appreciate if you could provide 3 available dates for the defendant to be deposed in Miami between October 22nd and November 19. Once we have agreed on a mutually available date, we will provide the notice of deposition.

thank you